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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

FEIFEI FAN, an individual,

Plaintiff,

VS.

STATE OF NEVADA EX REL. BOARD OF  
REGENTS OF THE NEVADA SYSTEM OF  
HIGHER EDUCATION, ON BEHALF OF THE  
UNIVERSITY OF NEVADA, RENO,

**Defendant.**

CASE NO: 3:24-cv-00427-MMD-CLB

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT (ECF #15)  
(First Request)**

COMES NOW, Plaintiff, FEIFEI FAN, (hereinafter “Plaintiff”), by and through her counsel of record, Trevor J. Hatfield, Esq., of the law firm of Hatfield & Associates, Ltd., and Defendant captioned above (hereinafter “Defendant”), by and through its counsel, the Assistant General Counsel for the University of Nevada, Reno, do hereby stipulate and agree to extend time for Plaintiff to respond to Defendant’s Motion For Summary Judgment (ECF #15), due on February 13, 2025, to March 14, 2025. This request is submitted pursuant to LR IA 6-1, 6-2 and LR 7-1 and is the parties’ first request for an extension of time for Plaintiff to respond to Defendant’s Motion for Summary Judgment. Defendant shall have a reciprocal extension for the filing of a Reply. Good cause exists for this extension. The Court has scheduled an Early Neutral Evaluation (“ENE”) for

1 March 3, 2025. The outcome of the ENE could render the Motion for Summary Judgment moot.  
2 Additionally, each party has a trial scheduled in either February and March 2025.

3 Defendant has courteously agreed to this extension of time for Plaintiff to file his Response.  
4 Accordingly, Plaintiff shall have up to and including March 14, 2025, to respond to Defendant's  
5 Motion for Summary Judgment (ECF #15). Consistent with this extension, Defendant's reply to  
6 Plaintiff's response shall be due 14 days after filing and service of Plaintiff's response.  
7

8 **IT IS SO STIPULATED.**

9 Dated: February 12, 2025

10 Dated: February 12, 2025

11 **HATFIELD & ASSOCIATES**

12 /s/ *Trevor J. Hatfield*  
13 By: \_\_\_\_\_  
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20 **ASSISTANT GENERAL COUNSEL UNR**

21 /s/  
22 By: \_\_\_\_\_  
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28 Attorneys for Defendant

19 **ORDER**

20 **IT IS SO ORDERED:**

21 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2025.

22 \_\_\_\_\_  
23 DISTRICT COURT JUDGE  
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